

1 Leon Dayan, SBN 153162  
2 Abigail V. Carter\*  
3 Ramya Ravindran\*  
4 Lane M. Shadgett\*  
5 J. Alexander Rowell\*  
6 **BREDHOFF & KAISER P.L.L.C.**  
7 805 Fifteenth Street NW, Suite 1000  
8 Washington, D.C. 20005  
9 Tel. (202) 842-2600  
10 Fax (202) 842-1888  
11 ldayan@bredhoff.com  
12 acarter@bredhoff.com  
13 rravindran@bredhoff.com  
14 lshadgett@bredhoff.com  
15 arowell@bredhoff.com  
16 \*Application *pro hac vice* pending

17 Daniel Feinberg, SBN 135983  
18 Catha Worthman, SBN 230399  
19 Anne Weis, SBN 336480  
20 **FEINBERG, JACKSON, WORTHMAN**  
21 **& WASOW, LLP**  
22 2030 Addison Street, Suite 500  
23 Berkeley, CA 94704  
24 Tel. (510) 269-7998  
25 Fax (510) 269-7994  
26 dan@feinbergjackson.com  
27 catha@feinbergjackson.com  
28 anne@feinbergjackson.com

*Attorneys for Plaintiffs* (Additional Counsel not listed)

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03070-JD

**DECLARATION OF ROBERT  
O'BRYCKI**

Declaration of Robert O'Brycki  
Case No. 3:25-cv-03070-JD

**DECLARATION OF ROBERT O'BRYCKI**

I, Robert O'Brycki, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the President of General Services Administration Council (GSA Council) of the National Federation of Federal Employees ("NFFE"). NFFE is a national labor organization and unincorporated membership organization headquartered in Washington, D.C.

3. Nationwide, NFFE represents approximately 110,000 federal workers, approximately 10,000 of whom are dues-paying members, from agencies across the federal government.

4. NFFE GSA Council and the Locals that are members of the Council represent approximately 3,150 employees working at the GSA. NFFE members include professionals that provide essential services to the operations of all agencies within the federal government, in many locations throughout the nation. These employees consist of IT specialists, building managers, budget analysts, program analysts, realty specialists, project managers, asset managers, transportation specialists, and auditors.

5. NFFE's GSA Council and member locals have demanded to bargain over Trump administration policies including the return to in-office work and telework. NFFE has also placed requests for information on these subjects.

6. NFFE's GSA Officers and stewards represent employees primarily on official time which the Executive Order abolishes in the GSA. Our members perform much of their representation using GSA equipment such as computers, computer systems and phones, also abolished by the Executive Order. The loss of official time and use of agency equipment will significantly impact our ability to represent our members.

7. NFFE represents our federal sector members through negotiating collective bargaining agreements and assisting employees with enforcing them. We assert contractual and statutory rights on behalf of our federal sector members by filing grievances, unfair labor practice charges, or other complaints through our negotiated grievance procedure or with various

1 federal agencies, including the Federal Labor Relations Authority, the Merit Systems Protection  
2 Board, the Office of Special Counsel, and the Federal Labor Relations Authority. NFFE files  
3 litigation on employees' behalf in the courts. We also advocate Capitol Hill and in the media on  
4 issues of importance to federal workers.

5 8. NFFE's operations are funded solely by members who pay dues to be members of  
6 the union, almost exclusively through Agency dues withholding. NFFE will be financially  
7 harmed if the Executive Order is implemented because it will immediately lose dues revenue  
8 from members who are covered by the Executive Order. In that event, NFFE would immediately  
9 lose hundreds of thousands of dollars of revenue. NFFE currently does not have a mechanism to  
10 maintain membership of union members replacing Agency dues withholding.

11 9. NFFE's ability to conduct its mission will be severely curtailed if union members  
12 in the GSA no longer have collective bargaining rights and cannot pay dues to NFFE through  
13 Agency dues withholding. For example, NFFE would not have the ability to maintain current  
14 staff levels, help with training union leaders, assisting with grievances, negotiating collective  
15 bargaining agreements, advocating for employees on Capitol hill, and filing litigation on behalf  
16 of the employees we represent.

17 10. NFFE members pay dues voluntarily as federal employees.

18 11. The GSA has placed entire sections and departments responsible for auditing,  
19 compliance, and administration of essential government contracts on administrative leave,  
20 pending Reduction in Force actions, without collective bargaining obligations being met by the  
21 Agency. This has caused fear and distress in those employees and places further strain on the  
22 remaining staff completing the Agencies' statutory performance of duties. Without the unions'  
23 ability to represent, we could see continued harm to employees and their families.

24 12. We have heard from members who are concerned about NFFE losing strength and  
25 bargaining power because of the threat of diminished membership and smaller bargaining units.  
26 NFFE leverages its size and the fact we represent approximately 110,000 federal employees when  
27 advocating in the media or to Congress and when bargaining with agencies. The Executive Order

stands to reduce NFFE's size and capacity, thereby curbing our abilities to advocate for positive change for federal workers.

13. Since the signing of President Trump's E.O. 14207 on March 27th, 2025, the GSA has unilaterally and unlawfully revoked recognition of the National Federation of Federal Employees (NFFE) as the exclusive representative of its bargaining units, in direct violation of established labor law and collective bargaining rights. By ordering the immediate cessation of all union-related activities conducted on official duty time, prohibiting the use of GSA office space, equipment, and resources by the union, and demanding the prompt return of government-issued property, GSA has effectively dismantled the union's ability to represent its members. Furthermore, the suspension of all pending grievances, arbitrations, and bargaining activities previously protected under the collective bargaining agreement constitutes a clear breach of labor protections. The agency's directive that all future union communications be routed solely through the National Labor Relations Team represents an additional obstruction to lawful union representation. These actions reflect a deliberate and retaliatory effort to suppress federal employees' right to collective representation.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed April 1<sup>st</sup>, 2025, in Washington, District of Columbia.

*Robert O'Brycki*

Robert Alan Obrycki (Apr 1, 2025 18:01 EDT)

Robert O'Brycki